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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS, INC., et al.

Debtors.

Chapter 11

Case No. 08-13555 (JMP)

(Jointly Administered)

**OBJECTION TO DEBTORS' MOTION FOR THE ESTABLISHMENT OF THE
DEADLINE FOR FILING PROOFS OF CLAIM, APPROVAL OF THE FORM AND
MANNER OF NOTICE THEREOF AND APPROVAL OF THE CLAIM FORM**

BlueMountain Capital Management LLC ("BlueMountain"), a creditor of the captioned debtors, by and through its counsel, Lowenstein Sandler PC, hereby joins in and adopts the objections filed by Aviva S.p.A., Aviva Italia Holdings S.p.A., Aviva Vita S.p.A., Aviva Life S.p.A., Aviva Italia S.p.A., Aviva Assicurazioni S.p.A., Aviva Previdenza S.p.A., US AGBank, FCB and Barclays Bank PLC (collectively the "Objections") to the Motion of the Debtors pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) for Establishment of the Deadline for Filing Proofs of Claim, Approval of the Form and Manner of Notice Thereof and Approval of the Proof of Claim Form (the "Proof of Claim Motion").

WHEREFORE BlueMountain respectfully requests that this Court deny the Proof of Claim Motion for all the reasons set forth in the Objections, and grant it such other and further relief as this Court deems just and proper.

Dated: New York, New York
June 12, 2009

LOWENSTEIN SANDLER PC

By: /s/ Paul Kizel

Paul Kizel (PK4176)

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